

# EXHIBIT 1

**Hill, Brian**

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**From:** Hill, Brian  
**Sent:** Friday, October 04, 2013 3:49 PM  
**To:** Richard D. Heideman; Noel J. Nudelman; Tracy Kalik; [rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com)  
**Cc:** Rochon, Mark; Ferguson, Laura  
**Subject:** RE: Gilmore v. PIA: Violation of Sokolow Protective Order

Counsel,

Having received no response to my email below, we will proceed to seek relief from the Court.

Regards,

Brian A. Hill  
Miller & Chevalier Chartered  
655 Fifteenth Street, N.W. Suite 900  
Washington, DC 20005-5701  
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**From:** Hill, Brian  
**Sent:** Friday, October 04, 2013 8:13 AM  
**To:** Richard D. Heideman; Noel J. Nudelman; Tracy Kalik; [rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com)  
**Cc:** Rochon, Mark; Ferguson, Laura  
**Subject:** Gilmore v. PIA: Violation of Sokolow Protective Order

Counsel:

Paragraphs 2-4 of the Declaration of Robert J. Tolchin (DE 329-1), which Plaintiffs filed by ECF in this matter, contains information that had been designated and marked at the time of production as "Confidential" under the terms of the Protective Order governing discovery in the Sokolow case. *See Sokolow v. PLO*, No. 04-CV-397 (GBD) (RLE) at DE 219 (SDNY). By doing so, Plaintiffs and/or their counsel in this matter have violated the terms of the Sokolow Protective Order. *Id.* I therefore insist that Plaintiffs take immediate action to remedy their violation of that Protective Order. Please let me know immediately if you will do so or if we must seek relief from the Court.

Regards,

Brian A. Hill  
Miller & Chevalier Chartered  
655 Fifteenth Street, N.W. Suite 900  
Washington, DC 20005-5701  
Business: (202) 626-6014  
Facsimile: (202) 626-5801